

ATTORNEYS EYES ONLY

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1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 CASE NO.: 2:18cv530
4

5 CSX TRANSPORTATION, INC.,
6 individually and on behalf of
7 NORFOLK & PORTSMOUTH BELT LINE
8 RAILROAD COMPANY,
9 Plaintiff,
10 vs.
11 NORFOLK SOUTHERN RAILWAY
12 COMPANY, et al.,
13

Defendants.
14
15 _____/

16 ATTORNEYS EYES ONLY
17 VIDEOTAPED DEPOSITION OF
18 MARYCLARE KENNEY
19 Friday, December 11, 2020
20 9:49 a.m. - 3:42 p.m.
21 Remote Proceedings
22
23

24 Stenographically Reported By:
25 Gina Rodriguez, RPR, CRR, CCP



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1 A. It means converting business from one means
2 to another.

3 Q. And have -- have you attempted to convert
4 business from the West Coast to the East Coast?

5 A. What I would tell you is, once again, have
6 we had conversations with customers about ports,
7 sure. We try, as we talk to all of our customers, to
8 make sure they understand we recognize they need to
9 make a decision around what ports they're calling and
10 that we want to provide a comprehensive service
11 product that we can serve them whether they choose to
12 come into a West Coast port or they choose to come
13 into an East Coast port; and on the East Coast,
14 whichever port they decide to come into.

15 Q. And you -- you do sell -- strike that.
16 Strike that.

17 What does double-stacking mean to you?

18 A. It's two -- a container on top of a
19 container, on a train.

20 Q. Does the ability to double-stack give a
21 railroad a competitive advantage over a railroad that
22 doesn't double-stack?

23 A. It's -- you can move more product on the
24 same train line.

25 Q. So is that a "yes"?

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1 A. Sure.

2 Q. Okay. What -- what terminal options do
3 shippers have when moving containers into or out of
4 the Hampton Roads area?

5 A. What -- what terminal options?

6 Q. Yes.

7 A. Port -- I'm sorry, port terminal options or
8 rail terminal options or . . .

9 Q. Port terminal options.

10 A. So the two ports in -- in Virginia are NIT
11 and VIG.

12 Q. Okay. Was there a period of time when PMT
13 was operating as well?

14 A. Yes, there was.

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